## SENT BY E-MAIL (rmd.odi@dot.gov)

Mr. Claude Harris
Acting Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
NVS-200, Room W45-306
Washington, D.C. 20590

## Re: Part 573 Defect Information Report

Dear Mr. Harris:

Pursuant to 49 CFR Part 573 and on behalf of our parent company, Daimler AG, Mercedes Benz USA, LLC (MBUSA) advises you of a safety recall campaign to be conducted on MY 2000-2002 Mercedes-Benz M-Class and MY 2000-2004 M-Class AMG vehicles.

## 573.6 (c)(1): Manufacturer's Name

Daimler AG, Stuttgart, Germany
Designated Agent: Mercedes-Benz USA, LLC
Montvale, NJ 07645
573.6(c)(2)(i): Identification of Vehicles

| Make | Line/Model | Model Year | Dates of Manufacture |
| :--- | :--- | :--- | :--- |
| Mercedes-Benz | M-Class | $2000-2002$ | $08 / 1999-07 / 2002$ |
|  | M-Class AMG | $2000-2004$ | $08 / 1999-06 / 2004$ |

## 573.6(c)(2)(iv): Manufacturer's Name of Affected Component and Country of Origin

Not applicable. The manufacturer of the brake lamp switch was provided in response to PE 10050.

## 573.6(c)(3): Total Number of Vehicles Potentially Containing the Defect

136,751 Mercedes-Benz M-Class and M-Class AMG vehicles are potentially affected in the US.

## 573.6(c)(4): Percentage of Vehicles Estimated to Actually Contain the Defect

All of the subject vehicles will be subject to the remedy described below.

## 573.6(c)(5): Description of Defect

The cruise control system in the affected vehicles allows the driver to disengage the system by depressing the brake pedal or by using the cruise control stalk. The cruise control is also designed to disengage automatically when the vehicle achieves a certain deceleration rate ( 1.5 meters $/ \mathrm{sec}^{2}$ for more than 0.8 seconds) or when the speed is reduced below 25 miles/hour. Daimler AG (DAG) determined that the signal to disengage cruise control may not be initiated if the plunger within the brake lamp switch becomes immovable. In this situation, the driver can still disengage the cruise control, achieving the referenced deceleration rate by applying an amount of brake pedal force comparable to that used when approaching a traffic light. If the driver responds to this situation by pumping the brake pedal instead of a stronger application of the brake pedal, the brake booster vacuum can be consumed. In that case, excessive pedal force may become necessary to achieve the requisite deceleration rate, or speed, to disengage the cruise control. The cruise control can also be disengaged by pushing the stalk towards the instrument cluster. A brake lamp switch with an immobilized plunger, combined with the additional brake pedal forces necessary if booster vacuum is exhausted, gives rise to the defect addressed through this safety recall. A failure or delay in disengaging cruise control can increase the risk of a crash.

## 573.6(c)(6): Chronology of Principal Events

DAG initiated an investigation into potential cruise control issues in September 2010 after receiving complaints regarding the potential inability to disengage cruise control. Upon further investigation, and in connection with the PE dated December 2010 regarding potential brake lamp switch failures, DAG determined that the level of pedal force necessary to disengage the cruise control is responsible for customer reports regarding difficulty in disengaging the cruise control while driving.

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## 573.6(c)(8)(i): Remedy Program

MBUSA will conduct a voluntary recall campaign for the subject vehicles. MBUSA will replace the brake lamp switch to remediate the potential need for excessive brake pedal force to disengage the cruise control.

## 573.6(c)(8)(iii): Estimated Date of Owner and Dealer Notification

MBUSA expects to initiate the voluntary recall campaign, and to send dealer and owner notification, in September, 2011.

## 573.6(c)(10): Copies of Communications with Dealers and Purchasers

Copies will be provided when available.

## 573.6(c)(11): Manufacturer's Campaign Identification Number

The MBUSA Recall Campaign Number will be provided when available.
Should you have any questions, please do not hesitate to contact Mr. R. Thomas Brunner at brunnert@mbusa.com.

Sincerely,


General Manager, Engineering Services


